

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

GARNISHEE'S ANSWER

Having been served with a Writ of Garnishment, Garnishee hereby files this Answer.

This Answer is being prepared by:

Name: David J. Creagan

Title: Partner & General Counsel

Address: White and Williams LLP
1650 Market Street, Suite 1800
Philadelphia, PA 19103

Phone Number: 215-864-7032

DESCRIPTION OF GARNISHEE

Garnishee files this Answer as: (check those that apply)

☐ An Individual

☐ In my personal capacity.

☐ Doing business as,
Name of d/b/a:
Address:

Phone Number:

☒ A Partnership; and Garnishee is:

☐ A general partner

☒ A limited partner
Name of Partnership: White and Williams LLP

Address: 1650 Market Street, Suite 1800, Philadelphia, PA 19103

Phone Number: 215-864-7000

☐ A Corporation

Name of Corporation:

Address:

Phone Number:

State of Incorporation:

Principal Place of Business:

PRIOR GARNISHMENTS

For each previous garnishment involving Defendant which is still in effect, please provide the following information:

Date of Garnishment: N/A

Property Subject to the Previous Garnishment: N/A

DESCRIPTION OF PROPERTY IN WHICH DEFENDANT HAS AN INTEREST

Garnishee states as follows: (check those that apply)

☒ From the date the Writ of Garnishment was served on September 21, 2022 to the date this Answer is being prepared, Garnishee has not had possession, custody or control of any property in which Defendant has an interest.

☐ Garnishee has possession, custody or control of the following non-earnings property in which Defendant has an interest:

Description of Property:

Approximate Value of Property:

Defendant's Interest in the Property:

☐ Garnishee anticipates having future possession, custody or control of the following non-earnings property in which Defendant will have an interest:

Description of Property:

Approximate Value of Property:

Defendant's Interest in the Property:

When Defendant Will Acquire An Interest in the Property:

- ☐ As Defendant's employer, Garnishee has possession, custody or control of earnings in which Defendant has an interest:

Defendant is paid: ☐ weekly, ☐ bi-weekly, ☐ semi-monthly, ☐ monthly

Date Previous Pay Period Ended:

Date Current Pay Period Ends:

- a. Defendant's Gross Pay:
- b. Federal Income Tax Withheld:
- c. F.I.C.A. Withheld:
- d. State Income Tax Withheld:
- e. Total Withholdings (b + c + d):
- f. Net Earnings (a e):

GARNISHEE'S CLAIMS

Garnishee makes the following claims: (check those that apply)

- ☐ Garnishee makes the following claim of exemption on behalf of Defendant:

Amount of Exemption:

Nature of Exemption:

- ☒ Garnishee has the following objections, defenses, or set-offs against the United States' right to seek garnishment of Defendant's non-exempt property in Garnishee's possession, custody or control (describe nature of objection, defense, or set-off):

Defendant owes Garnishee for past-due invoices for legal services provided to Defendant. Should Garnishee ever receive all or part of the amount owed, Garnishee at that time will exercise its right of set-off under New York and Federal law.

CERTIFICATE OF SERVICE

Garnishee certifies that it has served a copy of this Answer on both the:

☒ Defendant: Edward Bronson

Date of Service: October 6, 2022

Method of Service: First-Class Mail (include address if service was by mail)

Edward Bronson
515 East 72nd Street, Suite 11B
New York, NY 10021

☒ Defendant: E-Lionheart Associates, LLC d/b/a Fairhills Capital, Inc.

Date of Service: October 6, 2022

Method of Service: First-Class Mail (include address if service was by mail)

E-Lionheart Associates, LLC d/b/a Fairhills Capital, Inc.
c/o Edward Bronson
515 East 72nd Street, Suite 11B
New York, NY 10021

and

Fairhills Capital, Inc.
245 Main Street, #390
White Plains, NY 10601

☒ Plaintiff: Securities and Exchange Commission

Date of Service: October 6, 2022

Method of Service: First Class Mail (include address if service was by mail)

Maureen Peyton King
Senior Trial Counsel
Securities and Exchange Commission
New York Regional Office
100 Pearl Street, Suite 20-100
New York, NY 10004

OATH

Garnishee declares under penalty of perjury that the foregoing is true and correct.

Date: October 5, 2022

Signature: [Handwritten Signature]

Subscribed and sworn before me this 5th day of October 2022.
[Handwritten Signature] (SEAL)
Notary Public

Commission Expires: _____

